

1 GARG GOLDEN LAW FIRM
2 ANTHONY B. GOLDEN, ESQ.
3 Nevada Bar No. 9563
4 PUNEET K. GARG, ESQ.
5 Nevada Bar No. 9811
6 3145 St. Rose Parkway, Suite 230
7 Henderson, Nevada 89052
8 Tel: (702) 850-0202
9 Fax: (702) 850-0204
10 Email: pgarg@garggolden.com
11 Email: agolden@garggolden.com

12 Counsel for Defendant

13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 ALFRED DARNELL GREENE and
16 CHRISTOPHER SUASAENG, individually, and
17 on behalf of all others similarly situated,

18 Plaintiffs,

19 vs.

20 OMNI LIMOUSINE, INC.,

21 Defendant.

CASE NO.: 2:18-CV-01760-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
TO RESPOND TO PLAINTIFFS' PRE-
DISCOVERY MOTION FOR
CONDITIONAL COLLECTIVE
CERTIFICATION AND COURT-
SUPERVISED NOTICE TO
POTENTIAL OPT-IN PLAINTIFFS
PURSUANT TO 29 U.S.C. § 216(B)**

[FIRST REQUEST]

22 The parties, by and through their counsel of record, hereby stipulate and agree as follows:

23 1. That Defendant's time to respond to Plaintiffs' Pre-Discovery Motion for
24 Conditional Collective Certification and Court-Supervised Notice to Potential Opt-In Plaintiffs
25 Pursuant to 29 U.S.C. § 216(B) (ECF No. 23) (the "Motion") shall be extended from February 19,
26 2019 to and including **March 5, 2019**.

27 2. That the limitations period for the claims of putative collective action members
28 shall be tolled, meaning Defendant will waive the statute of limitations affirmative defense, by
fourteen (14) days—the time period of the extension agreed to above—from the date putative
collective action members file their consent to join this lawsuit.

1 3. This tolling period does not revive any otherwise untimely claims of putative
2 collective action members.

3 4. This tolling period is expressly conditioned upon the Court allowing the parties the
4 extension requested herein. Should the Court deny the request, the tolling period shall be null and
5 void and of no effect.

6 This is the first request for an extension of this deadline. It is sought in good faith and not
7 made for the purposes of delay. Defendant's counsel's firm lost an attorney recently, which has
8 placed additional work load on the remaining two attorneys, and they have been unable to
9 sufficiently review the facts with Defendant to respond to the Motion by the current deadline.
10 Additionally, counsel for the parties are exploring early resolution options and wish to dedicate

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1 time and resources to that effort in the event it can be accomplished prior to the extended deadline
2 requested.

3 Dated this 14th day of February, 2019.

Dated this 14th day of February, 2019.

4 GARG GOLDEN LAW FIRM

WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN LLP

6 By /s/ Anthony B. Golden

7 ANTHONY B. GOLDEN, ESQ.
8 3145 St. Rose Parkway, Suite 230
Henderson, Nevada 89052
(702) 850-0202

9 *Counsel for Defendant*

By /s/ Don Springmeyer

DON SPRINGMEYER, ESQ.
DANIEL BRAVO
3556 E. Russel Rd., 2nd Floor
Las Vegas, NV 89120
(702) 341-5200

SOMMERS SCHWARTZ, P.C.

JASON J. THOMPSON, ESQ. (*Pro hac
pending*)

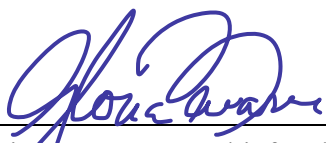
ROD M. JOHNSTON, ESQ. (*Pro hac
pending*)

One Towne Square, Suite 1700
Southfield, Michigan 48076

Counsel for Plaintiffs

15 IT IS SO ORDERED.

16 Dated this 4 day of March, 2019.

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20 _____
21 Gloria M. Navarro, Chief Judge
22 UNITED STATES DISTRICT COURT
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